

COUNT 108

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2004 – Incident 4

449. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

450. On or about October 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

451. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

452. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 109

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2004 – Incident 1

453. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

454. On or about November 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

455. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

456. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 110

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2004 – Incident 2

457. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

458. On or about November 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

459. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

460. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 111

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2004 – Incident 3

461. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

462. On or about November 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

463. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

464. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 112

Cause of Action Pursuant to 18 U.S.C. § 2255

November 2004 – Incident 4

465. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

466. On or about November 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

467. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

468. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 113

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2004 – Incident 1

469. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

470. On or about December 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

471. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

472. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 114

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2004 – Incident 2

473. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

474. On or about December 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

475. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

476. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 115

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2004 – Incident 3

477. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

478. On or about December 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

479. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

480. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 116

Cause of Action Pursuant to 18 U.S.C. § 2255

December 2004 – Incident 4

481. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

482. On or about December 2004, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

483. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

484. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 117

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2005 – Incident 1

485. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

486. On or about January 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

487. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

488. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 118

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2005 – Incident 2

489. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

490. On or about January 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

491. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

492. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 119

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2005 – Incident 3

493. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

494. On or about January 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

495. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

496. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 120

Cause of Action Pursuant to 18 U.S.C. § 2255

January 2005 – Incident 4

497. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

498. On or about January 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

499. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

500. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 121

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2005 – Incident 1

501. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

502. On or about February 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

503. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

504. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 122

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2005 – Incident 2

505. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

506. On or about February 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

507. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

508. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 123

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2005 – Incident 3

509. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

510. On or about February 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

511. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

512. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 124

Cause of Action Pursuant to 18 U.S.C. § 2255

February 2005 – Incident 4

513. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

514. On or about February 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

515. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

516. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 125

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2005 – Incident 1

517. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

518. On or about March 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

519. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

520. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 126

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2005 – Incident 2

521. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

522. On or about March 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

523. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

524. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 127

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2005 – Incident 3

525. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

526. On or about March 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

527. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

528. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 128

Cause of Action Pursuant to 18 U.S.C. § 2255

March 2005 – Incident 4

529. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

530. On or about March 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

531. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

532. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 129

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2005 – Incident 1

533. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

534. On or about April 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation

enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

535. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

536. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 130

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2005 – Incident 2

537. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

538. On or about April 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

539. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

540. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 131

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2005 – Incident 3

541. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

542. On or about April 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is

therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

543. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

544. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 132

Cause of Action Pursuant to 18 U.S.C. § 2255

April 2005 – Incident 4

545. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

546. On or about April 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

547. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

548. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 133

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2005 – Incident 1

549. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

550. On or about May 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this

Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

551. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

552. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 134

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2005 – Incident 2

553. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

554. On or about May 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

555. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

556. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 135

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2005 – Incident 3

557. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

558. On or about May 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

559. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

560. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 136

Cause of Action Pursuant to 18 U.S.C. § 2255

May 2005 – Incident 4

561. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

562. On or about May 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of

numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

563. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

564. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right 137

COUNT 137

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2005 – Incident 1

565. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

566. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

567. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

568. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 138

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2005 – Incident 2

569. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

570. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

571. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

572. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 139

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2005 – Incident 3

573. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

574. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

575. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

576. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 140

Cause of Action Pursuant to 18 U.S.C. § 2255

June 2005 – Incident 4

577. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

578. On or about June 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

579. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

580. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 141

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2005 – Incident 1

581. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

582. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

583. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

584. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 142

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2005 – Incident 2

585. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

586. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is

therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

587. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

588. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 143

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2005 – Incident 3

589. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

590. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

591. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

592. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 144

Cause of Action Pursuant to 18 U.S.C. § 2255

July 2005 – Incident 4

593. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

594. On or about July 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this

Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

595. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

596. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 145

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2005 – Incident 1

597. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

598. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

599. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

600. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 146

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2005 – Incident 2

601. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

602. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

603. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

604. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 147

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2005 – Incident 3

605. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

606. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a

violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

607. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

608. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 148

Cause of Action Pursuant to 18 U.S.C. § 2255

August 2005 – Incident 4

609. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

610. On or about August 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

611. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past

suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

612. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 149

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2005 – Incident 1

613. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

614. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to

engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

615. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

616. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided

by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 10

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2005 – Incident 2

617. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

618. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

619. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of

self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

620. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 151

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2005 – Incident 3

621. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

622. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct,

child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

623. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

624. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 152

Cause of Action Pursuant to 18 U.S.C. § 2255

September 2005 – Incident 4

625. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

626. On or about September 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

627. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse

and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

628. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 153

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2005 – Incident 1

629. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

630. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e).

L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

631. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

632. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 154

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2005 – Incident 2

633. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

634. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

635. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and

psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

636. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 155

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2005 – Incident 3

637. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

638. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to

this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

639. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

640. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

COUNT 156

Cause of Action Pursuant to 18 U.S.C. § 2255

October 2005 – Incident 4

641. Plaintiff, L.M. adopts and realleges paragraphs 1 through 20 above.

642. On or about October 2005, the exact date being unknown to L.M., Defendant, Jeffrey Epstein, committed a federal sexual offense against her, including a violation of numerous federal criminal statutes condemning the coercion and enticement of a minor to engage in prostitution or sexual activity, travel with intent to engage in illicit sexual conduct, sex trafficking of children, sexual exploitation of minor children, transport of visual depictions of a minor engaging in sexually explicit conduct, child exploitation enterprises, and other crimes, specifically including, but not limited to, those crimes designated in 18 U.S.C. § 2422(b), § 2423(a), § 2423(b), and § 2423(e). L.M. is therefore a victim of one or more offenses enumerated in 18 U.S.C. § 2255 and, as such, asserts a cause of action against the defendant, Jeffrey Epstein, pursuant to this Section of the United States Code and the agreement between the Defendant, Jeffrey Epstein, and the United States Government.

643. As a direct and proximate result of the offenses enumerated in Title 18, United States Code, Section 2255, being committed against her, L.M. has in the past suffered, and will in the future suffer, physical injury pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and conventional way of life for a minor. The then-minor plaintiff L.M. incurred medical and psychological expenses and the plaintiff, L.M., will in the future suffer medical and psychological expenses. The plaintiff, L.M., has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These

injuries are permanent in nature and the plaintiff, L.M., will continue to suffer these losses in the future.

644. Wherefore, the plaintiff, L.M., demands judgments against the defendant, Jeffrey Epstein, for compensatory damages of at least the minimum amount provided by law, attorney's fees, costs, and such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands trial by jury on all issues triable as of right by a jury.

DATED July 24, 2009

Respectfully Submitted,



Bradley J. Edwards
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JS 44 (Rev. 2/08)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS		DEFENDANTS	
L.M.		JEFFREY EPSTEIN	
(b) County of Residence of First Listed Plaintiff <u>Palm Beach</u> (EXCEPT IN U.S. PLAINTIFF CASES)		County of Residence of First Listed Defendant <u>Palm Beach</u> (IN U.S. PLAINTIFF CASES ONLY)	
(c) Attorney's (Firm Name, Address, and Telephone Number) Rothstein Rosenfeldt Adler 401 East Las Olas Blvd., Suite 1650 Fort Lauderdale, FL 33301 - Phone 954-522-3456		NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT LAND INVOLVED.	
		Attorneys (If Known) Bradley J. Edwards	
(d) Check County Where Action Arose: <input type="checkbox"/> MIAMI- DADE <input type="checkbox"/> MONROE <input type="checkbox"/> BROWARD <input checked="" type="checkbox"/> PALM BEACH <input type="checkbox"/> MARTIN <input type="checkbox"/> ST. LUCIE <input type="checkbox"/> INDIAN RIVER <input type="checkbox"/> OKEECHOBEE HIGHLANDS			
II. BASIS OF JURISDICTION (Place an "X" in One Box Only)		III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)	
<input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)		PTF DEF Citizen of This State <input type="checkbox"/> 1 <input type="checkbox"/> 1 Incorporated or Principal Place of Business In This State <input type="checkbox"/> 4 <input type="checkbox"/> 4	
<input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)		Citizen of Another State <input type="checkbox"/> 2 <input type="checkbox"/> 2 Incorporated and Principal Place of Business In Another State <input type="checkbox"/> 5 <input type="checkbox"/> 5	
9:09CV81092-Cohn-Soltzer		Citizen or Subject of a Foreign Country <input type="checkbox"/> 3 <input type="checkbox"/> 3 Foreign Nation <input type="checkbox"/> 6 <input type="checkbox"/> 6	
IV. NATURE OF SUIT (Place an "X" in One Box Only)			
CONTRACT		TORTS	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 290 All Franchise		PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	
PERSONAL PROPERTY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability		FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	
CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 449 Other Civil Rights		BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	
PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		SOCIAL SECURITY <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	
IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions		FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
		OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	
V. ORIGIN (Place an "X" in One Box Only)		Appeal to District Judge from Magistrate Judgment	
<input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Re-filed- (see VI below) <input type="checkbox"/> 4 Reinstated or Recopened <input type="checkbox"/> 5 Transferred from another district (specify)		<input type="checkbox"/> 6 Multidistrict Litigation <input type="checkbox"/> 7	
VI. RELATED/RE-FILED CASE(S)		a) Re-filed Case <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO b) Related Cases <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO JUDGE DOCKET NUMBER 9:08-cv-80119	
		Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):	
VII. CAUSE OF ACTION 18 USC Section 2255		LENGTH OF TRIAL via <u>10-14</u> days estimated (for both sides to try entire case)	
VIII. REQUESTED IN COMPLAINT:		CHECK IF THIS IS A CLASS ACTION <input type="checkbox"/> DEMAND \$ <u>IN EXCESS</u> 1,000,000.00 CHECK YES only if demanded in complaint: UNDER F.R.C.P. 23 JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE		SIGNATURE OF ATTORNEY OF RECORD DATE <u>7/24/09</u>	
		FOR OFFICE USE ONLY AMOUNT <u>35000</u> RECEIPT # <u>546977</u> IFF <u>546977</u>	